

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
as assignee of individuals who are Covered Persons,
JANE DOE-1, a law enforcement officer, JANE
DOE-2, a law enforcement officer, EDWIN
MALDONADO, SCOTT MALONEY, JUSTYNA
MALONEY, PATRICK COLLIGAN and
WILLIAM SULLIVAN,

Case No. 24-4390

Plaintiff/Counterclaim Defendant,

v.

FORTNOFF FINANCIAL, LLC, RICHARD ROES
1-10, Fictitious names of unknown individuals
and ABC COMPANIES 1-10, fictitious names of
unknown entities,

Defendant/Counterclaim Plaintiff.

NOTICE OF LIEN ON BEHALF OF GENOVA BURNS LLC

PLEASE TAKE NOTICE as follows:

1. Genova Burns LLC represented Plaintiff/Atlas Data Privacy Corporation in the above matter. Genova Burns LLC no longer represents Plaintiff/Atlas Data Privacy Corporation in the above matter.
2. Genova Burns LLC hereby asserts and has a lien for legal fees and costs rendered to Plaintiffs in the above-entitled action pursuant to applicable case law. Because the firm has a lien and the amount of our share of the legal fees and costs will be determined after a recovery in this action, the defendants are put on notice that any settlement check(s) should be payable to counsel of records and Genova Burns LLC, as lienholder.
3. Further, we hereby direct that other than distributions made to Genova Burns LLC pursuant to paragraph 2 above, no other monies be paid or assets or things be provided directly to Atlas Data Privacy Corporation or Atlas Data Privacy Corporation's heirs,

attorneys, representatives, successors and assigns until the amount of our lien has been fixed by a Court Order.

Respectfully submitted,
GENOVA BURNS LLC

BY: s/James M. Burns
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*Attorney for Plaintiff/Counterclaim
Defendant, Atlas Data Privacy Corp.*

Dated: March 13, 2025

CERTIFICATION OF SERVICE

On March 13, 2025, I filed the foregoing NOTICE OF LIEN with the clerk of court for the District Court, District of New Jersey, via the Court's CM/ECF system, which caused a copy of the foregoing to be served on all counsel of record.

s/James M. Burns
JAMES M. BURNS